

Civil Action No: 5:17-cv-00259-BO

Defendant.

3. Currently, the deadline for Plaintiff to file motions to strike, dismiss, or otherwise respond to Defendant's Answer, Motion to Dismiss, and Motion for Bond is August 10, 2017. *See* Fed.R.Civ.P. 12 (a)(1), (b), and (f)(2).

4. Plaintiff is in the process of drafting motions to strike, dismiss, or otherwise respond to the Answer, Motion to Dismiss, and Motion for Bond. However, Plaintiff requires a slight extension of time.

5. Additionally, Plaintiff's counsel, David Tamaroff, Esq., will be traveling with his family from August 13, 2017 through August 23, 2017.

6. Accordingly, Plaintiff respectfully requests that the Court grant it a fifteen (15) day extension, or until August 25, 2017, to file motions to strike, dismiss, or otherwise respond to the Answer, Motion to Dismiss, and Motion for Bond.

7. Plaintiff's counsel has conferred with counsel for Defendant, who does not oppose the relief requested herein.

8. This extension is for good cause, will not result in unjust delay, and will not jeopardize the Defendants in any way. Indeed, the relief requested herein will allow Plaintiff to provide the Court with a more concise and refined pleadings, promoting judicial economy and the "just, speedy, and inexpensive determination" of this action. Fed.R.Civ.P. 1.

WHEREFORE, Plaintiff respectfully requests that the time within which it has to file motions to strike, dismiss or otherwise respond to the Answer, Motion to Dismiss, and Motion for Bond be extended fifteen (15) days, or until August 25, 2017. A proposed order is attached for the Court's convenience.

[Signatures and Certificate of Service on following page.]

Dated: August 10, 2017.

Respectfully submitted

/s/ David F. Tamaroff

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And

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Local Civil Rule 83.1 Counsel for Plaintiff VOIT Technologies, LLC

CERTIFICATE OF SERVICE

I hereby certify that, on August 10, 2017, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and that service was perfected on all parties or counsel of record through this system.

By: /s/ David F. Tamaroff

David F. Tamaroff, Esq.